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REGULATORY AUTH.



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Suite 700  
511 Union Street  
Nashville, Tennessee 37219

February 22, 1999  
OFFICE OF THE  
EXECUTIVE SECRETARY

David Waddell  
Executive Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: *BellSouth Telecommunications, Inc's Tariff to Introduce New  
LATA Wide Version of Area Plus ® Service*

**Docket No. 98-00634**

Dear Mr. Waddell:

Please find enclosed for filing the original and thirteen  
copies of AT&T's First Set of Data Requests and Requests  
for Production of Documents to BellSouth.

Sincerely,

A handwritten signature in cursive script that reads "Jim Lamoureux" followed by a circled "Q".  
Jim Lamoureux

Encls.

cc: all parties

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**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

Re: *BellSouth Telecommunications, Inc's Tariff to Introduce New LATA Wide  
Version of Area Plus ® Service*

**Docket No. 98-00634**

**AT&T'S FIRST SET OF DATA REQUESTS AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO BELL SOUTH**

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AT&T Communications of the South Central States, Inc. ("AT&T") hereby serves the following Data Requests and Requests for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth"), to be answered on or before March 1, 1999, pursuant to the Notice of January 21, 1999 issued by the TRA in this proceeding.

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, including but not limited to BellSouth Corporation, BellSouth Long Distance ("BSLD"), BellSouth, BSE ("BSE"), their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

3. "Bell Operating Company" means any company defined in 47 U.S.C. §153(35), and its parents, subsidiaries, and affiliates, their present and former officers,

employees, agents, directors, and all other persons acting or purporting to act on behalf of the Bell Operating Company.

4. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including but not limited to correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

7. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to, conversations, telecommunications, and documents.

8. The phrase "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information what would not otherwise not be brought within their scope.

10. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

11. "Identify" or "identifying" or "identification" when in used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home and business telephone numbers of the person.

12. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

13. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it:
  - (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the

circumstances surrounding the authorization for each such disposition and the date of such disposition.

14. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

### **INSTRUCTIONS**

1. If you contend that any response to any interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.
5. For each interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer

#### **DATA REQUESTS**

1. Please explain why BellSouth desires to offer a service which provides a different metric for IntraLATA calls, i.e., a monthly fee basis rather than a per minute basis? Please produce all documents, including but not limited to memoranda, workpapers, and analyses, which support or underlie BellSouth's desire to offer intraLATA service on a monthly fee basis.
2. How much additional revenue does BellSouth expect to realize on an annual basis as a result of introducing its LATA wide Area Calling Plan? Please produce all documents, including but not limited to memoranda, workpapers, and analyses, which underlie or support BellSouth's calculation of the annual revenue it expects to realize from its LATA wide Area Calling Plan.
3. What assumptions, such as take rates and subscriptions level, underlie or support the calculation of the additional revenue BellSouth expects to realize on an annual basis as a result of its LATA wide Area Calling Plan?

4. Please produce cost information and revenue analyses similar to the information BellSouth produced in Kentucky in Case Nos. 98-287 and 288 on April 13, 1998, and May 11, 1998, and produce all documents, including but not limited to memoranda, workpapers, and analyses, which underlie or support the revenue analysis and cost information.
5. Please provide narrative explanations of the information provided in response to Data Request No. 4 similar to the narrative BellSouth provided in response to KPSC Data Request Nos. 4 and 7 in Case Nos. 98-287 and 288.
6. What is the target market for BellSouth's LATA wide Area Calling Plan? Please produce all documents, including but not limiting to memoranda, workpapers, and analyses which underlie or support BellSouth's identification of the target market for its LATA wide Area Calling Plan.
7. What is the anticipated take rate for BellSouth's LATA wide Area Calling Plan? Please explain in detail how this take rate was determined and produce all documents, including memoranda, workpapers and analyses which underlie or support the anticipated take rate.
8. What take rate was estimated for winbacks for BellSouth's LATA wide Area Calling Plan? Please explain in detail how this take rate for winbacks was determined and produce all documents, including memoranda, workpapers and analyses which underlie or support the anticipated take rate for winbacks.
9. Is the LATA wide Area Calling Plan designed to be more attractive to larger or smaller customers? Please explain why?



10. What stimulation rate has BellSouth assumed for its LATA wide Area Calling Plan? Please produce all documents including but not limited memoranda, workpapers and analyses, which underlie or support the stimulation rate BellSouth assumed for its LATA wide Area Calling Plan.
11. Please produce all documents pertaining or relating to any and all market research conducted by BellSouth in connection with its LATA wide Area Calling Plan.
12. To what customers does BellSouth intend to direct market its LATA wide Area Calling Plan?
13. Please provide the impact on cost and revenue that would occur if BellSouth marketed its LATA wide Area Calling Plan to all customers.
14. Does BellSouth intend to mass advertise its LATA wide Area Calling Plan?
15. How did BellSouth develop the amount of the monthly subscription fee for its LATA wide Area Calling Plan? Please produce all documents, including but not limited to memoranda, workpapers, and analyses, which support or underlie BellSouth's development of the monthly subscription for its LATA wide Area Calling Plan.
16. Did BellSouth impute any costs in developing the monthly fee, e.g. marketing, billing, network, and access?
17. Did BellSouth impute access costs when it developed the monthly fee? If so, please produce all documents, including workpapers, memoranda, and analyses that form the basis of such imputation. If not, please explain why not, and produce all documents which support BellSouth's rationale for not imputing access.

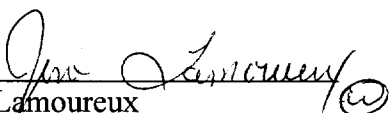
18. What is the incremental cost to BellSouth of implementing its LATA wide Area Calling Plan, including both fixed and recurring costs? Please produce all documents which underlie or support the calculation of the incremental cost to BellSouth of implementing its LATA wide Area Calling Plan
19. Please provide any information in BellSouth's possession that indicates the expected conversation minutes-of-use that its LATA wide Area Calling Plan will generate.
20. Please provide any information in BellSouth's possession that indicates the number of conversation minutes that the plan must generate, to the average customer, before the effective price per-minute is lower than BellSouth's intraLATA switched access rate in Tennessee.
21. Please provide any information in BellSouth's possession that indicates the level of stimulation expected in BellSouth's intraLATA minutes in Tennessee as a result of the introduction of BellSouth's LATA wide Area Calling Plan.
22. Please provide all documents, including memoranda, analyses, and work papers identifying entire LATAs as communities of interest.
23. What percentage of BellSouth's current intraLATA toll customers, if they subscribed to BellSouth's plan, would pay less per month under BellSouth's plan than the amount IXCs would have to pay BellSouth for intraLATA switched access for a similar number of intraLATA toll calls per month?
24. Will BellSouth offer intraLATA carriers the option to purchase intraLATA access on a per customer basis or a per minute basis?

25. If it will not, please explain why BellSouth will not offer intraLATA carriers the option of buying access on a per customer or per minute basis, other than the current structure of access charges or current tariffs.
26. What is the cost that BellSouth incurs to provide intraLATA switched access in Tennessee? Please produce all documents, including memoranda, workpapers, and analyses, that indicate the cost that BellSouth incurs, on a per-minute basis, to provide intraLATA switched access services in Tennessee.
27. Please produce all documents, including memoranda, workpapers, and analyses, that indicate the cost that BellSouth incurs, on a per customer per month basis, to provide intraLATA switched access services in Tennessee.
28. How are the arrangements for originating and terminating calls different for LATA wide Area Plus calls compared to long distance calls?
29. Please describe the compensation arrangements between BellSouth and any other LECs or CLECs in Tennessee for originating and/or terminating LATA wide Area Plus calls.
30. Produce any and all documents that identify or set forth the arrangements referred to in Data Request No. 29, including specifically any agreements with LECs and CLECs.
31. If a CLEC's interconnection agreement allows a CLEC to define intraLATA calls as local calls, will BellSouth agree to provide that CLEC intraLATA access at the interconnection rate set forth in the agreement? If not, why not?
32. Produce all documents, including but not limited to memoranda, workpapers, and analyses pertaining or relating to the interaction of this calling plan with, and/or

relation of this calling plan to BellSouth's plans to offer interLATA services in Tennessee.

33. Produce all documents pertaining or relating to any tests (including but not limited to market research tests) conducted of this calling plan with any proposed BellSouth (including BellSouth Long Distance ("BSLD") interLATA plans.
34. Produce all documents pertaining or relating to the relationship of this calling plan with the introduction of 1+ intraLATA presubscription.

Respectfully submitted,



Jim Lamoureux  
AT&T Communications of the  
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1200 Peachtree Street, N.E.  
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February 22, 1999

**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 1999 a record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:


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